

JOSE MARTINEZ - JULY 26, 2022

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1 was the case settled?

2 A I want to say withdrawn. Maybe that's not a
3 legal term, but I know that essentially everybody shook
4 hands and walked away.

5 Q Was there any written agreement connection
6 with the ending of the lawsuit?

7 A Mr. Thomas Griffin would be able to answer
8 that.

9 Q Well, I'm asking you if you have any
10 independent recollection as to whether or not any sort
11 of settlement agreement was entered into in connection
12 with that lawsuit?

13 MR. BEGAKIS: Objection. Objection.
14 Argumentative and to the extent it calls for
15 speculation.

16 MR. BERMAN: Over your counsel's
17 objection, you can answer.

18 THE WITNESS: What I can verify for a
19 fact is that there's still an outstanding balance that
20 has not been recouped.

21 BY MR. BERMAN:

22 Q That's not my question. My question is
23 whether or not there was a written settlement agreement
24 entered into in connection with the lawsuit that you
25 were referring to previously.



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1 A I don't remember signing anything. Whether
2 the attorneys took action on that course, I'm unaware of
3 it.

4 Q And when you say that there was an advanced
5 recoup, is it your belief that an outstanding unrecouped
6 advance would be a prohibition on the transfer of title
7 to a sound recording?

8 MR. BEGAKIS: Objection. Calls for a
9 legal conclusion.

10 MR. BERMAN: I'm asking for his
11 understanding. And over your client's objection, you
12 could answer.

13 MR. BEGAKIS: Same objection. Regardless
14 of whether you want the understanding, I'm objecting on
15 the fact that it's calling for legal conclusion.

16 MR. BERMAN: You can answer, Mr.
17 Martinez.

18 THE WITNESS: My understanding is that a
19 verbal license may not be revoked if it hasn't been
20 fully recouped, and that is the circumstances with Mr.
21 Chuy Chavez, Jr.

22 BY MR. BERMAN:

23 Q Okay. And what is the basis for your
24 understanding that that's --

25 A What is the what? I'm sorry.